

# **Exhibit B**

**IN THE SUPERIOR COURT OF NEW JERSEY, BERGEN COUNTY, LAW DIVISION**

RICHARD M. ZELMA,  
940 Blanch Avenue  
Norwood, NJ 07648

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\*

*Pro se*

\*

Named Plaintiff,

\*

v.

\*

Case No.: BER-L-001776-19

LIBERTY POWER CORP., LLC,  
2100 W. Cypress Creek Rd, Suite 130  
Fort Lauderdale, FL 33309

\*

\*

Defendant.

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**NOTICE OF FILING OF NOTICE OF REMOVAL**

To the Clerk of the Court:

The Defendant, Liberty Power Corp., LLC, by and through counsel, hereby files a copy of the Notice of Removal filed on its behalf in the United States District Court for the New Jersey, Newark Division, to remove the above-captioned case from the Superior Court of New Jersey, Bergen County, Law Division, to the above-referenced United States District Court. A copy of the Notice of Removal is attached hereto as **Exhibit A**.

Dated: March 26, 2019

Respectfully submitted,

By: /s/ Nicholas M. Gaunce  
Nicholas M. Gaunce , Esq.

**CERTIFICATE OF FILING AND SERVICE**

I HEREBY CERTIFY that I caused a true and accurate copy of the foregoing to be filed electronically through the Court's e-Courts system and served upon the below by e-mail and regular mail:

Richard Zelma  
940 Blanch Avenue  
Norwood, NJ 07648  
tcpalaw@optonline.net  
*Appearing pro se*

/s/ Nicholas M. Gaunce  
Nicholas M. Gaunce